

Chrystal Mancuso-Smith (11153)  
**MANCUSO-SMITH LAW, PLLC**  
222 S. Main Street, Ste. 1830  
Salt Lake City, Utah 84101  
Telephone: (801) 906-9916  
Email: [slc.attorney@gmail.com](mailto:slc.attorney@gmail.com)

*Attorneys for Plaintiff and  
for Plaintiff's Guardian and Conservator John Hajicek*

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**IN THE UNITED STATES DISTRICT COURT**  
**DISTRICT OF UTAH, CENTRAL DIVISION**

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SAMANTHA HAJICEK,  
  
Plaintiff,

v.

VERNON HEPERI; GLORY DRAKE;  
LACEY REYNOLDS; JAY BROWN; JEFF  
VEST; CRAIG MERRILL; RYAN JUDD;  
BRAD BURR; ROBERTY EYRE; JOHN  
DOE #1; JOHN DOE #2; BRIGHAM YOUNG  
UNIVERSITY; CORPORATION OF THE  
PRESIDENT OF THE CHURCH OF JESUS  
CHRIST OF LATTER-DAY SAINTS;  
CORPORATION OF THE PRESIDING  
BISHOP OF THE CHURCH OF JESUS  
CHRIST OF LATTER-DAY SAINTS; THE  
CHURCH OF JESUS CHRIST OF LATTER-  
DAY SAINTS; ADDIE BRADBURN; and  
INTERMOUNTAIN HEALTH CARE,

Defendants.

**STIPULATION TO DISMISS WITHOUT  
PREJUDICE**

Case No. 2:14-cv-00640

Honorable Robert J. Shelby

Magistrate Judge Evelyn J. Furse

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Plaintiff Samantha Hajicek, through her counsel of record, Chrystal Mancuso-Smith (who is also attorney in fact for Plaintiff's guardian ad litem and conservator ad litem, John Hajicek), and Defendants Intermountain Health Care and Addie Bradburn (hereinafter, collectively the Intermountain Defendants), hereby stipulate and agree to the dismissal, without prejudice, of the

Intermountain Defendants in this matter, each of the parties to bear their own costs. This stipulation is entered into with the understanding that Plaintiff must first pursue her claims against the Intermountain Defendants through the Pre-litigation Panel process outlined under Utah's Medical Malpractice Act, codified as Utah Code. Ann. § 78B-3-401, et seq. This dismissal is not a waiver of any claims which may be revealed through the pre-litigation process or through Plaintiff's continued investigation of the facts and events comprising her Complaint.

DATED this 7th day of May, 2015.

**MANCUSO-SMITH LAW, PLLC**

By: \_\_\_\_\_  
Chrystal Mancuso-Smith  
*Attorney for Plaintiff and her Guardian Ad  
Litem and Conservator Ad Litem, John Hajicek*

DATED this 7th day of May, 2015.

**INTERMOUNTAIN HEALTH CARE, INC.**

By: /s/Signed with Permission  
David B. Erickson  
Matthew Ballard  
Attorneys for Defendants Ms. Addie Bradburn  
and Intermountain Health Care, Inc.

**CERTIFICATE OF SERVICE**

I hereby certify that on this 7<sup>th</sup> day of May, 2015, a true and correct copy of the foregoing **STIPULATION TO DISMISS WITHOUT PREJUDICE** was served on all counsel listed on the Court's ECF system.

/s/ Chrystal Mancuso-Smith